

COUNT TWO
(Sex Trafficking)

On or between March 3, 2018, and March 10, 2018, within the Southern District of Texas and elsewhere,

ROMELLO DEQUAES LEE

defendant herein, in and affecting interstate commerce, knowingly recruited, enticed, harbored, transported, provided, obtained, advertised, maintained, patronized and solicited by any means a person, namely a minor female known as MV2, who was under 18, and benefitted financially and by receiving anything of value from participation in a venture which has engaged in recruiting, enticing, harboring, transporting, providing, obtaining, maintaining, advertising, patronizing and soliciting by any means MV2 knowing and in reckless disregard of the fact that (1) means of force, threats of force, fraud, and coercion, and any combination of such means, would be used to cause MV2 to engage in a commercial sex act, and that (2) MV2, whom defendant had a reasonable opportunity to observe, had not attained the age of 18 years and would be caused to engage in a commercial sex;

In violation of Title 18, United States Code, Sections 1591(a), (b)(1) and (b)(2).

NOTICE OF FORFEITURE
(18 U.S.C. § 1594(d))

Pursuant to Title 18, United States Code, Section 1594(d), the United States gives notice to defendant,

ROMELLO DEQUAES LEE

that in the event of conviction of any of the offenses charged in Counts One and Two of this Indictment, the following property is subject to forfeiture:

(1) all real and personal property that was involved in, used, or intended to be used to commit or to facilitate the commission of such violation and all property traceable to such property; and

(2) all real and personal property constituting or derived from, proceeds obtained, directly or indirectly, as a result of such violation and all property traceable to such property.

Money Judgment and Substitute Assets

Defendant is notified that in the event of conviction, a money judgment may be imposed.

In the event that one or more conditions listed in Title 21, United States Code, Section 853(p) exists, the United States will seek to forfeit any other property of the defendants up to the total value of the property subject to forfeiture.

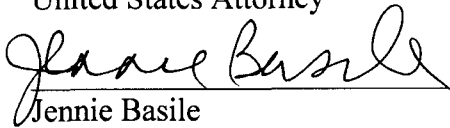
A True Bill:

ORIGINAL SIGNATURE ON FILE

Grand Jury Foreperson

RYAN K. PATRICK
United States Attorney

By:


Jennie Basile
Assistant United States Attorney